

Kenneth A. Okazaki (#3844)
Doyle S. Byers (#11440)
Michelle Quist (#13559)
HOLLAND & HART LLP
222 S. Main Street, Suite 2200
Salt Lake City, Utah 84111
Telephone: (801) 799-5800
Facsimile: (801) 799-5700
kaokazaki@hollandhart.com
dsbyers@hollandhart.com
mlquist@hollandhart.com

Jerome Romero (#5139)
P. O. Box 711004
Salt Lake City, UT 84171-1004
Telephone: (801) 706-3734
jerome@jromerolaw.net

*Attorneys for Defendant,
Brian Jessop*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

MARTIN J. WALSH, SECRETARY OF
LABOR, UNITED STATES DEPARTMENT
OF LABOR,

Plaintiffs,
vs.

PARAGON CONTRACTORS CORP.;
BRIAN JESSOP, an individual; and PAR 2
CONTRACTORS, LLC,

Defendants.

**PRELIMINARY DECLARATION OF
BRIAN JESSOP**

Case No. 2:06-cv-00700-TC

I, BRIAN JESSOP, hereby declare as follows:

1. I am over 18 years of age, fully competent to make this declaration, and do so based on my personal knowledge of the facts set forth herein and the content of business records known by me in the ordinary course of business by Paragon Contractors Corp.

2. The VIN for the Yukon located on my property: 1GKFK130X7J131340.

3. I answered, to the best of my knowledge, the questions regarding the disposition of the vehicles identified in the exhibits used at my March 16, 2022, deposition. I have no further information. Further, prior to today, I was not provided with a copy of the deposition exhibits. I have attempted to obtain a copy of the deposition exhibits from my counsel and have been advised that he did not order a copy from the court reporter, and with the closure of his law firm, did not have ready access to the exhibits. When I am provided a copy I will review and, if possible, further respond to this question.

4. For the vehicle dispositions identified in my deposition, all names and contact information that I recalled were provided at my deposition. Currently, I do not have any additional information. I do not have Tax Commission records in my possession and do not know what records might be in the Receiver's possession. If the Receiver will provide a copy of those records I will review and attempt to more fully respond to this question.

5. I do not have a specific recollection of the exact sales price for the trailers sold to James Jessop. I do not have current contact information for James. I do not have a specific recollection of where the sales proceeds were deposited. Per my usual and customary practice any sales proceeds would have been deposited in the Paragon bank account. I do not have any

records that would show those transactions. If those records are in the possession of the Receiver, I will review them and attempt to more fully respond to this question.

6. Of the 4 cell phones listed in the ATT bill referred to in my deposition, one line was not used or assigned by anyone, the remaining 3 cell phones shown by the Receiver in the depositions were used by family members: Rachael Jessop, Briley Jessop and Barbara Barlow.

7. To the best of my knowledge, Paragon did not pay any severance or bonus in connection with its winding down. I believe Paragon did sell vehicles to some employees. While there may be others, I recall that vehicles were sold to Ezra Barlow and Abram Allred. I don't have current contact information for Abram. I tried to call Ezra, but he did not answer, and his phone did not allow messages. I do not have any documents in my possession that would assist in answering this question. If the Receiver has documents that would be helpful to me in responding to this question, I will review them and, if possible, respond more fully.

Executed on this 19th day of August, 2022.

/s/Brian Jessop
Brian Jessop

CERTIFICATE OF SERVICE

I hereby certify that on August 22, 2022, I caused to be electronically filed the forgoing **DECLARATION OF BRIAN JESSOP** with the Clerk of Court using the GreenFiling system, which sent notification of such filing to all counsel of record in this matter.

/s/ Kimberlee Williams

19639865_v1